

FILED
CLERK, U.S. DISTRICT COURT

MAR 7, 2022

CENTRAL DISTRICT OF CALIFORNIA

BY: **JG** DEPUTY

CHING-CHIN CHEN (Full Name)

Chenc888@yahoo.com (Email Address)

818 La Cadina Ave apt L (Address Line 1)

Arcadia, CA 91007 (Address Line 2)

(626) 574-8280 (Phone Number)

Plaintiff in Pro Per
(Indicate Plaintiff or Defendant)

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

CHING-CHIN CHEN,
Plaintiff,

VS.

Santa Monica College
District
Defendant(s).

Case No.: 228-CV-07403-GW-E

Plaintiff's
(Indicate Plaintiff or Defendant)

**DECLARATION IN SUPPORT OF
OPPOSITION TO MOTION**

Declaration for settlement

Hearing Date: _____

Hearing Time: _____

Judge: _____
(Judge's name)

Place: _____
(courtroom number)

I, _____, declare as follows:
(print name)

1. I am the plaintiff in the above-entitled case.
(Indicate Plaintiff or Defendant)

2. I have personal knowledge of the following facts, and, if called as a witness, I could and would competently testify thereto.

1 **THE FACT:**

- 2 1. The Filed Document 119. It says Coury confers with the parties. Defendant's
3
4 motion is granted. Defendant will have 30 days from the date of this order
5
6 (2-3-22) to pay Plaintiff the \$15,000 settled in this matter. (See exhibit 1)
7
8 2. Defendant's attorney, John Stumreiter, filed to court on 03-04-22. (See
9
10 exhibit 2, 3, 4, 5, 6,).
11
12 3. Sending the check 4 days later.
13
14 4. First set to send overnight envelop on 3-7-22, at 8:00 pm. After Plaintiff
15
16 called in the morning then sent the check on 03-07-22 AA and received the
17
18 envelop in afternoon (after 1:00 pm, on 3-7-22). See exhibit 7, 8.
19
20 5. Sending the wired documents (See Exhibit 9, 10, 11, 12)
21

22 **ARGUMENT**

23 For sure, defendant's attorney, John Stumreiter, did not follow the court order.
24

25 **CONCLUSION**

26 The court should set a new mediation. The new mediation should with a new
27 mediator.
28

1 3-7-22

CHING-CHIN CHEN

2
3 Ching Chin Chen 3/7/22

4 Plaintiff

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

CIVIL MINUTES - GENERAL

Case No. CV 18-7403-GW-Ex

Date February 3, 2022

Title *Ching Chin Chen v. Santa Monica College District*

Present: The Honorable GEORGE H. WU, UNITED STATES DISTRICT JUDGE

Javier Gonzalez

Terri A. Hourigan

Deputy Clerk

Court Reporter / Recorder

Tape No.

Attorneys Present for Plaintiffs:

Attorneys Present for Defendants:

None Present

John J. Stumreiter, by telephone

**PROCEEDINGS: DEFENDANT'S MOTION TO ENFORCE AGREEMENT TO SETTLE
CASE [104]**

Plaintiff Ching Chin Chen, pro se, is also present by telephone.

Court confers with the parties. The Court's Final Ruling is attached hereto. Defendant's Motion is granted. Defendant will have 30 days from the date of this order to pay Plaintiff the \$15,000 settled in this matter. Court will dismiss this matter pursuant to the settlement once proof of payment is provided to the Court.

Initials of Preparer JG

: 20

1 LOUIS R. DUMONT
ldumont@crdlaw.com
2 JOHN J. STUMREITER (58415)
jstumreiter@crdlaw.com
3 CARPENTER, ROTHANS & DUMONT
500 South Grand Avenue, 19th Floor
4 Los Angeles, California 90071
Tel.: (213) 228-0400
5 Fax: (213) 228-0401

6 Attorneys for Defendant SANTA
7 MONICA COMMUNITY COLLEGE
DISTRICT (sued as Santa Monica
8 College District)

9
10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA

12 CHING CHIN CHEN,
13 Plaintiff,
14 vs.
15 SANTA MONICA COLLEGE
DISTRICT,
16 Defendant.
17
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28

Case No.: 2:18-cv-07403-GW-Ex

**DECLARATION OF JOHN J.
STUMREITER RE SETTLEMENT
PAYMENT; EXHIBIT**

DECLARATION OF JOHN J. STUMREITER

I, John J. Stumreiter, declare:

1. I am an attorney at law duly licensed to practice in the courts of the State of California, and I am a member of the bar of this Court. I work for the firm of Carpenter, Rothans & Dumont, LLP, counsel for defendant Santa Monica College District. I have personal first-hand knowledge of the facts stated herein; I can and do testify competently thereto.

2. On March 4, 2022, I had my secretary transmit to Ms. Chen a check for \$15,000.00 as the settlement payment. The check was sent to Ms. Chen via overnight mail, with an accompanying letter. A true and correct copy of such letter and the check are attached as Exhibit A.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed at Los Angeles, California on March 4, 2022.

/s/ John J. Stumreiter
John J. Stumreiter



Carpenter, Rothans & Dumont LLP

500 SOUTH GRAND AVENUE, 19TH FLOOR
LOS ANGELES, CALIFORNIA 90071
T: 213.228.0400
F: 213.228.0401
www.crdlaw.com

JOHN J. STUMREITER, ESQ.
jstumreiter@crdlaw.com

March 4, 2022

VIA OVERNIGHT MAIL

Ms. Ching-Chin Chen
818 La Cadena Ave., Apt. L
Arcadia, CA 91007

Re: *Chin-Chin Chen v. Santa Monica College District*
U. S. Dist. Ct. No. CV18-7403-SJO(Ex)

Dear Ms. Chen:

Enclosed with this letter is a check for \$15,000.00 in payment of the settlement in this case.

Very truly yours,

/s/John J. Stumreiter

John J. Stumreiter

JJS/lrg
Enclosures as stated
Fed Ex Tracking No. 7762 1522 8114

March 4, 2022

2022

Claimant: Ching-Chin Chen

Incident Date: 01/19/2017 #834

Claim#: 564287

Payment Type: Losses - Claimant -

For:

Invoice No:

From: 03/03/2022

Invoice Date:

Through: 03/03/2022

Santa Monica Community College District PL

Check Number: 101414

Check Date: 03/03/2022

Check Amount: 15,000.00

Adjusting Office: Torrance PLCA

Insured: Santa Monica Community College District

Examiner: Matthew Takeda

Examiner Phone: (310) 212-0363

THIS ORIGINAL DOCUMENT HAS A TRUE WATERMARK AND VOID PANTOGRAPH. DO NOT CASH IF NOT PRESENT.

Accredited Surety & Casualty Co-SWACC R&Q

Keenan & Associates
P.O. Box 4328
Torrance, CA 90510

Union Bank
445 S. Figueroa St.
Los Angeles, CA 90071-1602

101414

Claim Number: 564287

16-49-6 / 1220

Date: 03/03/2022

Claimant: Ching-Chin Chen

VOID AFTER 90 DAYS

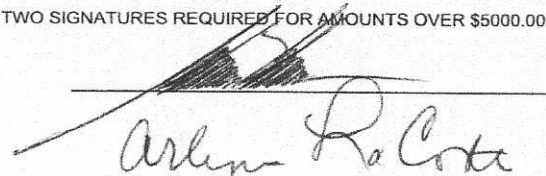
PAY Fifteen Thousand Dollars And 00/100

AMOUNT

\$15000.00**

TO THE ORDER OF: Ching-Chin Chen
818 La Cadena Ave Apt L
Arcadia, CA 91007-6897

TWO SIGNATURES REQUIRED FOR AMOUNTS OVER \$5000.00



101414 122000496 0093870541



Shipment Receipt

Address Information

Ship to:

CHING-CHIN CHEN

818 LA CADENA AVE
APT L
ARCADIA, CA
91007
US
000-000-0000

Ship from:

John J. Stumreiter, Esq.
CARPENTER ROTHANS &
DUMONT LLP
500 S Grand Ave
Suite 1900
Los Angeles, CA
90071
US
2132280400

Shipment Information:

Tracking no.: 776215228114

Ship date: 03/04/2022

Estimated shipping charges: 24.23 USD

Package Information

Pricing option: FedEx Standard Rate

Service type: Standard Overnight

Package type: FedEx Envelope

Number of packages: 1

Total weight: 0.50 LBS

Declared Value: 0.00 USD

Special Services: Residential Delivery

Pickup/Drop-off: Drop off package at FedEx location

Billing Information:

Bill transportation to: [REDACTED] REDACTED

Your reference: CHEN KA 1709

P.O. no.:

Invoice no.:

Department no.:

Thank you for shipping online with FedEx ShipManager at [fedex.com](https://www.fedex.com).

Please Note

FedEx will not be responsible for any claim in excess of \$100 per package, whether the result of loss, damage, delay, non-delivery, misdelivery, or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim. Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to the greater of \$100 or the authorized declared value. Recovery cannot exceed actual documented loss. Maximum for items of extraordinary value is \$1000, e.g., jewelry, precious metals, negotiable instruments and other items listed in our Service Guide. Written claims must be filed within strict time limits. Consult the applicable FedEx Service Guide for details. The estimated shipping charge may be different than the actual charges for your shipment. Differences may occur based on actual weight, dimensions, and other factors. Consult the applicable FedEx Service Guide or the FedEx Rate Sheets for details on how shipping charges are calculated.

Insert shipping document here

ORIGIN ID:JBPA (213) 228-0400
JOHN J. STUMREITER, ESQ.
CARPENTER ROTHANS & DUMONT LLP
500 S GRAND AVE
SUITE 1900
LOS ANGELES, CA 90071
UNITED STATES US

SHIP DATE: 04MAR22
ACTWGT: 0.50 LB
CAD: 110428373/INET4460

BILL SENDER

TO CHING-CHIN CHEN

818 LA CADENA AVE
APT L
ARCADIA CA 91007

(000) 000-0000
INV:
PO:

REF: CHEN KA 1709

DEPT:



4270201000100

FedEx Ship Manager - Print Your Label(s)

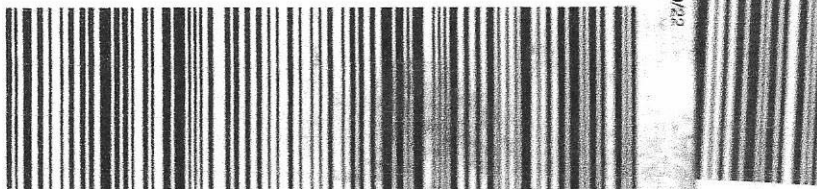
FedEx

TRK# 7762 1522 8114
0201

MON - 07 MAR AA 7 MAR 8:00P
STANDARD OVERNIGHT OVERNIGHT

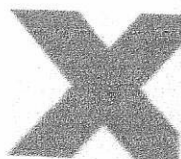
WZ WHPA

RES
91007 91007
CA-US BUR A-US BUR



4270485 03/04 SEDJ5/EB02/FE4R

647 7 20:00 B
ST 46 03/07



609

REALX

Envelop



ՀԱՅԱՍՏԱՆԻ ԿԵՍԵՐԻՆԵՐ

Վարչական տեղեկություն

Հրահար: ՄԱՐԿԱՆ
ՇԽԱՆՈ-ՇԽԱՆ ՇԽԱՆ

Հրահար:

ՆՈՐԱ ՀԱՅԱՍՏԱՆԻ ԿԵՍԵՐԻՆԵՐ
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000-0000-0000

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Հրահարի տեղեկություն

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Բացառիկ տեղեկություն

Բացառիկ տեղեկություն: ՖԵԴԵՐԱԿԱՆ ԿԵՍԵՐԻՆԵՐ

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Հրահար: ՆՈՐԱ ՀԱՅԱՍՏԱՆԻ ԿԵՍԵՐԻՆԵՐ

Ինքնաշարժիչի համարը: ՖԵԴԵՐԱԿԱՆ ԿԵՍԵՐԻՆԵՐ

Ինքնաշարժիչի համարը: ՖԵԴԵՐԱԿԱՆ ԿԵՍԵՐԻՆԵՐ

Ինքնաշարժիչի համարը: ՖԵԴԵՐԱԿԱՆ ԿԵՍԵՐԻՆԵՐ

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DECLARATION OF JOHN T. ZIMMERER

I, John T. Zimmerer, declare.

I am an attorney at law duly licensed to practice in the courts of the State of California and I am a member of the bar of this Court. I work for the firm of Zimmerer, Dunbar & Dunbar, LLP, located at 1100 California Street, Suite 1500, San Francisco, California 94109. I have personal knowledge of the facts stated herein. I can and do testify competently and truthfully.

On March 4, 2022, I had my secretary transmit to Ms. Chen a check for \$12,000.00 as the settlement payment. The check was sent to Ms. Chen via overnight mail with an accompanying letter. A true and correct copy of such letter is attached as Exhibit A. I declare under penalty of perjury that the foregoing is true and correct and I have declared the contents of this declaration to be true and correct.

John T. Zimmerer
John T. Zimmerer

DECLARATION OF DELIVERED BY MAIL

DATE OF BIRTH	BIRTHPLACE
1907-1908	RISHINI IN BIO BEL.
1909-1910	
1911-1912	

ΠΕΡΙΓΡΑΦΗ ΚΕ ΔΕΙΓΜΑΤΩΝ. ΚΑΛΩΝΕΙ.

Lynette Gonzales

Need to talk to Lou about scheduling the mediation in Jane LJ Doe in May

Need to talk about scheduling the mediation in Butler

Need to talk about Lopeteguy – we reserve 2 other Mx dates but will need to re-reserve. 3 court day deadline upon reserving date

EMAIL about moving trial?

Payle Lewis 5.20.22
FSC 5.11.22

Butler

16th maybe

17th maybe

29th maybe if Blake Depos are off

Arenas MSJ

SIMS —

SMCCD —

Johnson MSJ 3/28

CHING-CHIN CHEN (Full Name)
cheng888@yahoo.com (Email Address)
818 La Cadera Ave apt L (Address Line 1)
Arcadia, CA 91007 (Address Line 2)
(626) 514-8280 (Phone Number)

Plaintiff in Pro Per
(indicate Plaintiff or Defendant)

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

CHING-CHIN CHEN,
Plaintiff,

vs.

Santa Monica College
District

Defendant(s).

Case No.: 248-cv-07403-GW-8

PROOF OF SERVICE BY MAIL

I, CHING-CHIN CHEN, declare as follows:
(name of person serving documents)

My address is 818 La Cadera Ave apt L
Arcadia, CA 91007, which is located in the
county where the mailing described below took place.

On Arcadia, I served the document(s) described as:
(date of mailing)

(list the name of each document you are mailing)

opposition motion of Declaration for Settlement

on all interested parties in this action by placing a true and correct copy thereof in a sealed envelope, with first-class postage prepaid thereon, and deposited said envelope in the United States mail at or in _____,

(city and state of mailing)

addressed to:

Attorney John Summerter (name)

(name)

500 S. Grand Ave 19th Floor (address)

(address)

Los Angeles, CA 90071 (address)

(address)

(address)

(address)

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 3-8-22 (date)

at

Arcadia

(city and state of signing)

Ching-chin Chen (sign)

CHING-CHIN CHEN (print name)